

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re Application of:

CHEVRON CORPORATION, et al.,

*Applicants,*

for an Order Pursuant to 28 U.S.C. § 1782 to  
Conduct Discovery for Use in Foreign Proceedings

Index No. 10-mc-0002 (LAK)

**NOTICE OF MOTION TO QUASH  
OR MODIFY SUBPOENAS  
SERVED UPON  
STEVEN R. DONZIGER**

PLEASE TAKE NOTICE that, upon the accompanying Memorandum of Law, dated August 27, 2010, and Declaration of O. Andrew F. Wilson, dated August 27, 2010, and all exhibits thereto, and upon all papers and proceedings previously filed in the instant action, the Ecuadorian Plaintiffs,<sup>1</sup> by and through their undersigned counsel, will move this Court before the Honorable Lewis A. Kaplan, at the United States Courthouse, 500 Pearl Street, Courtroom 12D, New York, New York, 10007, at such time as counsel may be heard, for the entry of an order quashing or modifying the subpoenas served upon Steven R. Donziger by Chevron Corporation, Ricardo Reis Veiga, and Rodrigo Perez Pallares, and granting such other relief as this Court may deem just and proper.

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<sup>1</sup> The Ecuadorian Plaintiffs include: Daniel Carlos Lusitande Yaiguaje, Venancio Freddy Chimbo Grefa, Miguel Mario Payaguaje Payaguaje, Teodoro Gonzalo Piaguaje Payaguaje, Simón Lusitande Yaiguaje, Armando Wilmer Piaguaje Payaguaje, Javier Piaguaje Payaguaje, Fermín Piaguaje, Luis Agustín Payaguaje Piaguaje, Emilio Martin Lusitande Yaiguaje, Reinaldo Lusitande Yaiguaje, María Victoria Aguinda Salazar, Carlos Grega Huatatoca, Catalina Antonia Aguinda Salazar, Lidia Alexandra Aguinda Aguinda, Clide Ramiro Aguinda Aguinda, Luis Armando Chimbo Yumbo, Beatriz Mercedes Grefa Tanguila, Lucio Enrique Grefa Tanguila, Patricio Wilson Aguinda Aguinda, Patricio Alberto Chimbo Yumbo, Segundo Ángel Amanta Milán, Francisco Matías Alvarado Yumbo, Olga Gloria Grefa Cerda, Narcisa Tanguila Narváez, Bertha Yumbo Tanguila, Lucrecia Tanguila Grefa, Francisco Víctor Tanguila Grefa, Rosa Teresa Chimbo Tanguila, María Clelia Reascos Revelo, Heleodoro Pataron Guaraca, María Viveros Cusangua, Lorenzo José Alvarado Yumbo, Francisco Alvarado Yumbo, José Gabriel Revelo Llore, Luisa Delia Tanguila Narváez, José Miguel Ipiates Chicaiza, Hugo Gerardo Camacho Naranjo, María Magdalena Rodríguez, Elías Piyahuaje Payahuaje, Lourdes Beatriz Chimbo Tanguila, Octavio Córdova Huanca, Celia Irene Vivero Cusangua, Guillermo Payaguaje Lucitande, Alfredo Payaguaje, and Delfín Payaguaje.

Dated: August 27, 2010  
New York, New York

EMERY CELLI BRINCKERHOFF  
& ABADY LLP

/s/ O. Andrew F. Wilson

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